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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

NOV 16 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Truth-in-Billing)	
)	Notice of Proposed Rule Making
and)	CC Docket No. 98-170
)	
Billing Format)	

MOTION TO ACCEPT CORRECTED EXHIBITS FOR
COMMENTS OF PILGRIM TELEPHONE, INC.

On November 13, 1998, Pilgrim Telephone, Inc. ("Pilgrim"), by counsel, and pursuant to the captioned Notice of Proposed Rule Making, issued by the Federal Communications Commission ("FCC"), filed comments on the FCC's proposal. The exhibit to Pilgrim's comments contained slight inaccuracies.

Pilgrim respectfully requests that the incorrect exhibit be retracted and that the FCC accept the attached corrected exhibit to Pilgrim's comments.

Respectfully Submitted,

PILGRIM TELEPHONE, INC.

Dated: November 16, 1998

By: _____

Walter Steimel, Jr., Esq.

HUNTON & WILLIAMS
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 955-1500

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CRTC BILLING AND COLLECTION SERVICES ORDER

6 August 1998

To: PN 96-28 List

Subject: Commission Decision Regarding CRTC Interconnection Steering Committee Dispute on Billing and Collection Service Requirements

This letter constitutes the Commission's decision concerning whether, pursuant to Local Competition, Telecom Decision CRTC 97-8, 1 May 1997 (Decision 97-8), Competitive Local Exchange Carriers (CLECs) are required to provide Billing and Collection (B&C) services for Interexchange service providers similar to that provided by Stentor Resource Centre Inc. (Stentor) Operating Companies (SOCs).

fONOROLA Inc. (fONOROLA), Microcell Telecommunications Inc. and Vidéotron Télécom Ltée (Microcell et al) and Clearnet Communications Inc. (Clearnet) submitted that equal access only requires CLECs to provide pre-subscribed 1 + dialling to their subscribers, and does not require that they provide B&C services. They differentiated between "basic" or "essential" equal access (pre-subscribed 1 + dialling) and "enhanced" or "notional" equal access (providing B&C services). While fONOROLA, Microcell et al and Clearnet recognised that market forces may require them to provide such calls as alternate billed service (ABS) calls (e.g., collect, third party), they argued that if CLECs have to bill and collect, and ensure completion of all types of calls, they will also need to offer those services to their customers to stay competitive. fONOROLA, Microcell et al and Clearnet submitted that requiring CLECs to provide B&C services limits customer choice, as it limits the panoply of local service pricing options that CLECs could offer to customers. Furthermore, fONOROLA and Microcell et al raised concerns that they could be held liable for fraudulent calls billed to their customers even though they could not verify the legitimacy of the call.

Stentor submitted that, without B&C agreements, Interexchange carriers (IXCs) would not be able to bill for certain calls, such as ABS calls if such calls are charged to a line not pre-subscribed to the IXC handling the call. Since Decision 97-8 requires CLECs to provide equal access at terms and conditions equivalent to those contained in the Incumbent Local Exchange Carriers' (ILECs) tariffs, and states that subscribers should be able to complete calls with at least the same ease and efficiency as they currently do, Stentor submitted that CLECs must provide B&C services. Stentor further submitted that the Commission has ruled that equal access includes B&C services; thus it would be reviewing and varying previous decisions if it decided that CLECs are not required to provide B&C services.

Call-Net Enterprises Inc. (Call-Net) also submitted that CLECs had to provide B&C services. Call-Net stated that the Commission ordered ILECs to provide B&C services to prevent them from conferring an undue advantage on their toll services segments. Call-Net submitted that if CLECs were not required to provide B&C services, they would confer an undue advantage on their toll services segments, where they provide them. Call-Net also submitted that CLECs should be required to provide B&C services for social considerations, to ensure that subscribers be able to place calls with those LECs to which they are not pre-subscribed, in case of emergency, for example.

Both Stentor and Call-Net submitted that submissions that CLECs could potentially be held liable for fraudulent charges were unfounded, as B&C agreements protect and compensate LECs providing B&C services regarding liability for fraudulent calls. Stentor and Call-Net also submitted that issues concerning fraud and other operational and technological problems raised by the other parties were outside the scope of this dispute. Finally, Stentor and Call-Net stated that the Commission has never differentiated between "basic" or "essential" equal access and "enhanced" or "notional" equal access, as submitted by the other parties.

The Commission notes that, pursuant to Competition in the Provision of Public Long Distance Voice Telephone Services and Related Resale and Sharing Issues, Telecom Decision CRTC 92-12, 12 June 1992, ILECs must bill and collect on behalf of IXCs for casual calls and for calls charged to a line not pre-subscribed to the carrier handling the call. For their part, IXCs are required to execute a B&C service agreement, which details the terms and conditions of the service with the ILEC. The agreement specifies that, subject to certain restrictions, the ILEC will purchase from the IXC all accounts receivable for certain types of calls.

Paragraph 190 of Decision 97-8 states that CLECs must provide equal access at terms and conditions that are equivalent to those contained in the ILECs' tariffs. CLECs must justify any departure from these terms and conditions, including the B&C service agreement referred to in the tariff.

The Commission considers that equal access includes more than pre-subscribed 1 + dialling capability. As pointed out above, previous Commission rulings have defined the equal access environment in Canada. For example, in Decision 92-12, when determining equal access, the Commission stated that non-discriminatory access to local exchange facilities and related services and information extends to ancillary local facilities and services such as B&C services. Also, in Unbundled Rates to Provide Equal Access, Telecom Decision CRTC 97-6, 10 April 1997, the Commission included the rate for B&C services as a component of the equal access tariff.

The Commission is of the view that CLEC-provided equal access must include B&C services in order to give customers the ability to complete all types of calls with at least the same ease and efficiency that users enjoy at present, regardless of the service provider which originates, routes and/or terminates the call. In the Commission's view, no party has provided evidence to support departure from the Commission's requirement that CLECs be required to provide equal access under the same terms and conditions as the ILECs in respect of B&C services.

Finally, the Commission agrees with Stentor and Call-Net that concerns regarding fraud and other operational and technological issues fall outside the scope of this proceeding. The Commission notes that they could be addressed within the CISC B&C task force.

Yours sincerely,

Laura M. Talbot-Allan
Secretary General and
Chief Operating Officer

Stentor Resource
Centre Inc.

R.F. Farmer
Vice-President
Regulatory Matters

1998 08 12

Mrs. Laura M. Talbot-Allan
Secretary General and
Chief Operating Officer
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mrs. Talbot-Allan:

Subject: Central Fund Administration Agreement (Ontario and Quebec):
Filing of LEC Accession Agreement for Vidéotron Télécom Itée

1. In accordance with section 29(c) of the Telecommunications Act, Stentor Resource Centre Inc. is filing, on behalf of and with the concurrence of Bell Canada, the enclosed executed LEC Accession Agreement which makes Vidéotron Télécom Itée ("VTL") a party to the Central Fund Administration Agreement (Ontario and Quebec) (the "CFA Agreement"), filed with the Commission on March 16, 1998.

2. Section 10.14 of the CFA Agreement states:

Upon a Local Exchange Carrier, other than a Local Exchange Carrier which is an original party to this Agreement, having been confirmed to the CFA by the CRTC as meeting all of the requirements of the CRTC for a Local Exchange Carrier within the Bell Canada Operating Territory, such Local Exchange Carrier shall become a party to this Agreement in the manner hereinafter provided in this Section 10.14. Each such Local Exchange Carrier shall execute and deliver to the CFA a LEC Accession Agreement. Upon such LEC Accession Agreement having been countersigned by the CFA, and the CFA shall so counter-sign such LEC Accession Agreement upon being provided with such confirmation as it may reasonably require that such Local Exchange Carrier has been authorized by the CRTC to be a Local Exchange Carrier within the Bell Canada Operating Territory, such Local Exchange Carrier shall be considered a party to this Agreement

DOCUMENT CONTROL &
DISTRIBUTION CENTRE
160 Elgin St., Floor 22
Ottawa, Ontario K1G 3J4
Tel: (613) 781-7004
Fax: (613) 781-3395
Internet ID: SRCL_Regulatory@Stentor.ca

as a LEC as of the effective date set forth in such LEC Accession Agreement to the same extent as if such Local Exchange Carrier had been an original signatory to this Agreement as a LEC, and such Local Exchange Carrier shall be entitled to all of the benefits set forth in this Agreement which are for the benefit of LECs hereunder and shall be subject to all of the obligations of a LEC as set forth in this Agreement, all without any further action or requirement on the part of any other party to this Agreement.

3. On April 9, 1998, VTL filed Tariff Notice 3, requesting Commission approval of its General Tariff. This General Tariff includes terms of service governing its provision of services to other telecommunications service providers, and tariffs pertaining to access services for interconnection with interexchange carriers, wireless service providers and other local exchange carriers. By letter, dated June 3, 1998, the Commission granted interim approval to VTL's Tariff Notice 3, conditional on certain modifications being implemented. VTL has issued revised tariff pages implementing these modifications.

4. All of which is respectively submitted,

Yours truly

Vice-President -
Regulatory Matters

Encl.

c.c.: Bell Canada
Mr. Stephen Whitehead, c/o Johnston & Buchan - Secretary (Canadian Portable Contribution Consortium Inc.)
Mr. Chris Myles, c/o Stentor Canadian Network Management

ORDER

Ottawa, 23 September 1998

Telecom Order CRTC 98-942

On 12 August 1998, Stentor Resource Centre Inc. filed, on behalf of and with the concurrence of Bell Canada, an application for approval of a Local Exchange Carrier Accession Agreement, which makes Vidéotron Télécom ltée a party to the Central Fund Administration Agreement (Ontario and Quebec).

File No.: 8340-S1-0094/00

In light of the foregoing, the Commission orders that:

The proposed agreement is approved on an interim basis.

Laura M. Talbot-Allan
Secretary General

This document is available in alternative format upon request.

ORDONNANCE

Ottawa, le 23 septembre 1998

Ordonnance Télécom CRTC 98-942

Le 12 août 1998, le Centre de ressources Stentor Inc. a, au nom et avec l'accord de Bell Canada, déposé une demande en vue de faire approuver un accord d'accès d'entreprise de services locaux qui fait de Vidéotron Télécom ltée une partie à l'accord de gestion du fonds central (Ontario et Québec).

No de dossier : 8340-S1-0094/00

Compte tenu de ce qui précède, le Conseil ordonne ce qui suit :

L'accord proposé est approuvé provisoirement.

La secrétaire générale
Laura M. Talbot-Allan

Ce document est disponible, sur demande, en média substitut.

Canada

EMI BILLING RECORD FORMATS

RECORD LAYOUT SHADING REQUIREMENTS

The required definition and use of **Field Shading** for record layouts within this document is defined as follows:

<u>FIELD</u>	<u>DESCRIPTION</u>
Shaded	This field is not required and therefore, not applicable to this record. The field should be populated with the correct default value. The only edit performed on this field is a numeric check (if the field is defined as numeric). Use of this field to pass "local information" is discouraged. On returned records, this field may contain the default value regardless of how the sending company populated it.
Unshaded	This field is required and therefore will contain information based on the field definition. Under certain circumstances, it may be appropriate to populate this field with the default value indicating "no information". For example, if state and/or local taxes do not apply to a message, the "State Tax" and/or "Local Tax" fields will contain zeros.

Note The proper default for a numeric field is zeros. The proper default for an alphanumeric field is blanks.

RECORD DESCRIPTION

<u>01</u> Category	<u>01</u> Group	<u>01</u> Record Type
-----------------------	--------------------	--------------------------

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 01: MESSAGE TELEPHONE SERVICE CHARGE

Use of Record:

This record is used to bill long distance toll service.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- There are none.

**BILLABLE MESSAGE
NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE
800 SERVICE (RECORDED AT ORIG LOCATION)**

Record Name

01

Category

01

Group

05

Record Type

Field Description					Char.		
Pos.							
1	Category	Record Identification			X		
2							
3							
4	Group						
5							
6	Record Type						
7							
8	Year	Date Of Record			9		
9							
10	Month						
11							
12	Day						
13	From Number Length				9		
14							
15	NPA	From Number	From Base Station Number		9		
16							
17							
18							
19	NXX						
20							
21	Line Number						
22							
23							
24							
25	Overflow Digits				9		
26							
27							
28	To Number Length				9		
29							
30	NPA	To Number	To Base Station Number		9		
31							
32							
33							
34	NXX						
35							
36	Line Number						
37							
38							
39							
40	\$	Charge Or Amount Collected			9		
41							
42							
43							
44	¢						
45							
46	Min						
47	Type OF Regulation Indicator				9		
48	\$	State Tax	\$	Other Line/ Surcharge	\$	Total Module Tax and Surcharge	9
49	¢						
50			¢				
51		Local Tax	WATS Class		¢		
52	\$						
53	¢	Orig WATS Band					
54							
55	Hr	Connect Time			9		
56							
57							
58							
59	Min						
60	Sec						
61	Min	Billable Or Reported Time			9		
62							
63							
64							
65	Sec						
66							
67	1/10						

Field Characteristic
9 = Numeric
X = Alphanumeric

Field Description				Char			
Pos.							
68	Method Of Recording			9			
69	Reserved			9			
70	Reserved			9			
71	Reserved			9			
72	From RAO			9			
73	From RAO			9			
74	From RAO			9			
75	Local Company Information	Cust. Bill Format		9			
76		Conference Log Number		9			
77							
78	Rate Period			9			
79	Rate Class			9			
80	Message Type			9			
81	IOC Code		Term. WATS Band	9			
82	1	Indicators		9			
83	2						
84	3						
85	4						
86	5						
87	6						
88	7						
89	8						
90	9						
91	10						
92	11						
93	12						
94	13						
95	14						
96	15						
97	16						
98	17						
99	18						
100	19						
101	20						
102	Operator Unit		Serial Number	Obligation ID	9		
103							
104							
105	Recording Point Identification (AMA)						
106							
107							
108							
109							
110	Billing RAO				9		
111	Billing RAO				9		
112	Billing RAO				9		
113	Billing Number North American Standard			Billing Number Non Standard		X	
114							
115							
116							
117							
118							
119							
120							
121							
122							
123	\$	Coin Tariff Amt	North Amer. From Place	Over- seas From Place And Country	From Ship Name	CDAR No.	X
124							
125							
126	\$	Coin Fed Tax					
127							
128	\$						
129							
130	\$						
131							
132	SSAS Code		N.A. From			Pseudo Trunk No. (SPGI)	
133							
134	Cntrl						

RECORD DESCRIPTION

01

Category

01

Group

06

Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 06: NON-DIAL CONFERENCE CHARGE

Use of Record:

This record is used to bill all charges associated with an operator serviced conference call.

Headers/Trailers:

CMDS

Local

20-20-01/02

Y

Y

20-21-01/02

N

Y

20-22-01/02

Y

Y

20-22-03/04

Y

Y

Special Considerations:

- The operator must connect all conferees. *
- This record could be associated with two or more (optional) Non-Dial Conference Leg records (01-01-07).

BILLABLE MESSAGE NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE NON-DIAL CONFERENCE CHARGE

Record Name

01

Category

01

Group

06

Record Type

Pos.	Field Description			Char.
1	Category	Record Identification	X	
2				
3				
4	Group	Record Type		
5	Record Type			
6	Year			
7	Month	Date Of Record	9	
8	Day			
9	From Number Length			
10	NPA	From Number	9	
11	NXX			
12	Line Number			
13	From Base Station Number	From Base Station Number	9	
14	Overflow Digits			
15	To Number Length			
16	NPA	To Number	9	
17	NXX			
18	Line Number			
19	To Base Station Number	To Base Station Number	9	
20	Charge Or Amount Collected			
21	Type OF Regulation Indicator			
22	\$ State Tax	\$ Other Line/ Surcharge	9	
23	\$ Local Tax			
24	\$ WATS Class			
25	\$ Orig WATS Band	Connect Time	9	
26	Hr			
27	Min			
28	Sec	Billable Or Reported Time	9	
29	Min			
30	Sec			
31	1/10			

Field Characteristic
9 = Numeric
X = Alphanumeric

Field Description										Char		
Pos.												
68	Method Of Recording									9		
69												
70	Return Code									X		
71												
72	From RAO									9		
73												
74												
75	Local				Cust. Bill Format					9		
76	Company				Conference					9		
77	Information				Leg Number							
78	Rate Period									9		
79	Rate Class									9		
80	Message Type									9		
81	IOC Code				Term, WATS Band					9		
82	1	Indicators								9		
83	2											
84	3											
85	4											
86	5											
87	6											
88	7											
89	8											
90	9											
91	10											
92	11											
93	12											
94	13											
95	14											
96	15											
97	16											
98	17											
99	18											
100	19											
101	20											
102	Operator			Serial			Obligation			9		
103	Unit										Number	ID
104												
105	Recording											
106	Point											
107	Identification											
108	(AMA)											
109												
110	Billing RAO									9		
111												
112												
113	Billing Number North American Standard				Billing Number Non Standard					X		
114												
115												
116												
117												
118												
119												
120												
121												
122												
123	\$	Coin	North Amer. From Place	Over- seas From Place And Country	From Ship Name	CDAR No.		X				
124		Tariff										
125		Amt										
126	¢											
127	\$	Coin										
128		Fed										
129		Tax										
130	¢											
131	SSAS		N.A. From				Pseudo Trunk No. (SFG)					
132	Code											
133	CnCrCd											
134												

Field Description		Char
Pos.		
136	North American To Place	Overseas To Place And Country
136		
137		
138		
139		
140		
141		
142		
143		
144	No. American To State	To Ship Name
145		
146	Library Code	
147	Settlement Code	
148	Carrier Identification	Carrier Identification Expanded
149		
150	Reserved	
151	Treatable Indicator	
152	Indicators	9
153		
154		
155		
156		
157		
158		
159	LSPID	
160	Reserved For Local Company Use	
161		
162		
163		
164		
165		
166		
167		
168		
169		
170		
171		
172		
173		
174		
175		
176		
177		
178		
179		
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193		
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195		
196		
197		
198		
199		
200		

RECORD DESCRIPTION

01

Category

01

Group

07

Record Type

Category **01**: BILLABLE MESSAGE

Group **01**: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type **07**: NON-DIAL CONFERENCE LEG

Use of Record:

This is an optional record used for bill display only and provides the detail of each * individual leg associated with a conference call.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- This record, when used, is always associated with a Non-Dial Conference Charge Record (01-01-06).

BILLABLE MESSAGE NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE NON-DIAL CONFERENCE LEG

Record Name

01

Category

01

Group

07

Record Type

Field Description					Char.	
Pos.						
1	Category			Record Identification	X	
2						
3						
4						
5	Group					
6	Record Type			Date Of Record	9	
7						
8	Year					
9	Month					
10						
11	Day					
12						
13	From Number Length				9	
14						
15	NPA	From Number	From Base Station Number	9		
16						
17						
18						
19						
20	NXX					
21						
22	Line Number					
23						
24						
25	Overflow Digits				9	
26						
27						
28	To Number Length				9	
29						
30	NPA	To Number	To Base Station Number	9		
31						
32						
33						
34						
35	NXX					
36						
37	Line Number					
38						
39						
40	\$	Charge Or Amount Collected		9		
41						
42						
43						
44						
45	+					
46	Min.					
47	Type OF Regulation Indicator				9	
48	\$	State Tax	Other Line/ Surcharge	\$	Total Module Tax and Surcharge	
49						
50	+					
51						
52	\$	Local Tax	WATS Class	\$		
53						
54	+	Orig WATS Band				
55	Hr	Connect Time			9	
56						
57						
58						
59						
60	Min					
61	Sec					
62		Billable Or Reported Time			9	
63						
64						
65						
66						
67	1/10					

Field Characteristic
9 = Numeric
X = Alphanumeric

Field Description				Char			
Pos.							
68	Method Of Recording			9			
69							
70	Return Code			X			
71							
72	From RAO			9			
73							
74							
75	Local Company Information	Cust. Bilt Format		9			
76		Conference Leg Number		9			
77							
78	Rate Period			9			
79	Rate Class			9			
80	Message Type			9			
81	IOC Code	Term. WATS Band		9			
82	1	Indicators			9		
83	2						
84	3						
85	4						
86	5						
87	6						
88	7						
89	8						
90	9						
91	10						
92	11						
93	12						
94	13						
95	14						
96	15						
97	16						
98	17						
99	18						
100	19						
101	20						
102	Operator Unit		Serial Number	Obligation ID	9		
103							
104							
105	Recording Point						
106	Identification (AMA)						
107							
108							
109							
110	Billing RAO				9		
111							
112							
113	Billing Number North American Standard			Billing Number Non Standard		X	
114							
115							
116							
117							
118							
119							
120							
121							
122							
123	\$	Coin Tariff Amt.	North Amer. From Place	Over- seas From Place And Country	From Ship Name	CDAR No.	X
124							
125	\$	Coin Fed Tax				Pseudo Trunk No. 1960	
126							
127	+						
128							
129	SSAS Code						
130	CnCrCd						
131							
132							
133							
134							

Field Description				Char
Pos.				
135	North American To Place	Overseas To Place And Country	To Ship Name	X
136				
137				
138				
139				
140				
141				
142				
143	No. American To State			
144				
145	Library Code			X
146				
147	Settlement Code			X
148				
149	Carrier Identification	Carrier Identification Expanded		9
150				
151				
152				
153				
154	Reserved			9
155				
156	Treatable Indicator			9
157				
158 21	Indicators			9
159 22				
160 23				
161 24				
162 25				
163 26				
164 27				
165 28				
166 29				
167 30				
168				
169	LSPID			X
170				
171				
172	Reserved For Local Company Use			9
173				
174				
175				
176				

RECORD DESCRIPTION

01

Category

01

Group

08

Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 08: DIALED CONFERENCE BRIDGE CHARGE

Use of Record:

This record is used to bill all charges associated with the connection of a non- *
operator serviced conference call.

Headers/Trailers:

CMDS

Local

20-20-01/02

Y

Y

20-21-01/02

N

Y

20-22-01/02

Y

Y

20-22-03/04

Y

Y

Special Considerations:

- Conferees must dial in for connection to the Bridge. *
- Charges for individual conferee's dial-in to the Bridge are billed as regular toll or, if applicable, local.

BILLABLE MESSAGE **NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE** **DIALED CONFERENCE BRIDGE CHARGE**

01

Category

Field Description					Char.		
Pos.							
1	Category		Record Identification		X		
2							
3	Group						
4							
5	Record Type		Date Of Record		9		
6							
7	Year						
8	Month						
9							
10	Day						
11							
12							
13	From Number Length				9		
14							
15	NPA	From Number		From Base Station Number	9		
16							
17	NXX						
18							
19	Line Number						
20							
21							
22	Overflow Digits				9		
23							
24	To Number Length				9		
25							
26	NPA	To Number		To Base Station Number	9		
27							
28	NXX						
29							
30	Line Number						
31							
32							
33	\$	Charge Or Amount Collected			9		
34							
35	¢						
36							
37	Mill						
38	Type OF Regulation Indicator				9		
39	\$	State Tax	\$	Other Line/ Surcharge	\$	Total Module Tax and Surcharge	9
40							
41	¢	Local Tax	¢	WATS Class	¢		
42							
43	Orig. WATS Band						
44	Hr	Connect Time					9
45							
46	Min						
47							
48	Sec	Billable Or Reported Time					9
49							
50	Min						
51							
52	Sec						
53							
54							
55							
56							
57							
58							
59							
60							
61							
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82							
83							
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87							
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89							
90							
91							
92							
93							
94							
95							
96							
97							
98							
99							
100							

Field Characteristic
9 = Numeric
X = Alphanumeric

01

Group

Field Description				Char.			
Pos.							
68	Method Of Recording			9			
69							
70	Return Code			X			
71							
72	From RAO			9			
73							
74							
75	Local Company Information	Cust. Bill Format		9			
76		Conference Log Number		9			
77							
78	Rate Period			9			
79	Rate Class			9			
80	Message Type			9			
81	IOC Code	Term. WATS Band		9			
82	1	Indicators		9			
83	2						
84	3						
85	4						
86	5						
87	6						
88	7						
89	8						
90	9						
91	10						
92	11						
93	12						
94	13						
95	14						
96	15						
97	16						
98	17						
99	18						
100	19						
101	20						
102	Operator Unit	Serial Number	Obligation ID	9			
103							
104	Recording Point Identification (AMA)						
105							
106							
107							
108							
109							
110	Billing RAO			9			
111							
112							
113	Billing Number North American Standard		Billing Number Non Standard		X		
114							
115							
116							
117							
118							
119							
120							
121							
122							
123							
124	\$	Coin Tariff Amt	North Amer. From Place	Overseas From Place And Country	From Ship Name	CDAR No.	X
125	¢						
126	\$	Coin Fed Tax					
127	¢						
128							
129							
130							
131							
132	SSAS Code		N.A. From State			Pseudo Trunk No. (SFG)	
133	CnCrCd.						
134							

08

Record Type

Pos.		Field Description		Char	
135		North American To Place	Overseas To Place And Country	To Ship Name	X
136					
137					
138					
139					
140					
141					
142					
143					
144					
145	No. American To State				
146					
147	Library Code				X
148					
149	Settlement Code				X
150		Carrier Identification	Carrier Identification Expanded		9
151					
152					
153					
154	Reserved				9
155					
156					
157	Treatable Indicator				9
158	21	Indicators			9
159	22				
160	23				
161	24				
162	25				
163	26				
164	27				
165	28				
166	29				
167	30				
168					
169	LSPID				X
170					
171					
172					
173	Reserved For Local Company Use				9
174					
175					

RECORD DESCRIPTION

01

Category

01

Group

09

Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 09: BILLABLE CONFERENCE LEG CHARGE

Use of Record:

This record is used to bill individual conference leg charges associated with a non-dial conference call.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- There is no requirement to associate this record with a Conference Charge Record.

**BILLABLE MESSAGE
NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE
BILLABLE CONFERENCE LEG CHARGE**

Record Name

01

Category

Field Description					Char.			
Pos.								
1	Category		Record Identification		X			
2								
3	Group							
4								
5	Record Type							
6								
7	Year		Date Of Record		9			
8								
9	Month							
10								
11	Day							
12								
13	From Number Length				9			
14								
15	NPA	From Number		From Base Station Number	9			
16								
17								
18								
19	NXX							
20								
21								
22	Line Number							
23								
24								
25	Overflow Digits				9			
26								
27								
28	To Number Length				9			
29								
30	NPA	To Number		To Base Station Number	9			
31								
32								
33								
34	NXX							
35								
36								
37	Line Number							
38								
39								
40								
41	\$	Charge Or Amount Collected			9			
42								
43								
44	¢							
45								
46	Mill							
47	Type of Regulation Indicator				9			
48	\$	State Tax	\$	Other Line/ Surcharge	\$	Total Module Tax and Surcharge	9	
49	¢		¢					
50		Local Tax			¢			
51			WATS Class					
52	\$							
53	¢	Orig WATS Band						
54								
55	Hr	Connect Time				9		
56								
57	Min							
58								
59	Sec	Billable Or Reported Time				9		
60								
61								
62	Min							
63								
64								
65	Sec							
66								
67	1/10							

Field Characteristic
9 = Numeric
X = Alphanumeric

01

Group

Field Description				Char	
Pos.					
68	Method Of Recording			9	
69					
70	Return Code			X	
71					
72	From RAO			9	
73					
74					
75	Local	Cust. Bill Format		9	
76	Company	Conference		9	
77	Information	Leg Number			
78	Rate Period			9	
79	Rate Class			9	
80	Message Type			9	
81	IOC Code	Term WATS Band		9	
82	1	Indicators		9	
83	2				
84	3				
85	4				
86	5				
87	6				
88	7				
89	8				
90	9				
91	10				
92	11				
93	12				
94	13				
95	14				
96	15				
97	16				
98	17				
99	18				
100	19				
101	20				
102	Operator	Serial Number	Obligation ID	9	
103	Unit				
104					
105	Recording Point				
106	Identification (AMA)				
107					
108					
109					
110	Billing RAO			9	
111					
112					
113	Billing Number North American Standard		Billing Number Non Standard	X	
114					
115					
116					
117					
118					
119					
120					
121					
122					
123	\$	Com Tariff Amt	North Amer. From Place	Over-seas From Place And Country	CDAR No.
124					
125	¢				
126					
127	\$	Com Fed Tax	From Ship Name	Pseudo Trunk No. (SFO)	X
128					
129	¢				
130					
131			N.A. From State		
132	SSAS Code				
133	CnCrCd				
134					

09

Record Type

Field Description				Char
Pos.				
135	North American To Place	Overseas To Place And Country	Service Name	X
136				
137				
138				
139				
140				
141				
142				
143				
144				
145	No. America To State			
146				
147	Library Code			X
148				
149	Settlement Code			X
150				
151	Carrier Identification		Carrier Identification Expanded	9
152				
153				
154	Reserved			9
155				
156				
157	Treatable Indicator			9
158	21	Indicators		9
159	22			
160	23			
161	24			
162	25			
163	26			
164	27			
165	28			
166	29			
167	30			
168	LSPID			X
169				
170				
171				
172	Reserved For Local Company Use			9
173				
174				
175				

RECORD DESCRIPTION

<u>01</u>	<u>01</u>	<u>12</u>
Category	Group	Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 12: PERSON/COLLECT ANNOUNCEMENT CHARGE

Use of Record:

This record is used to bill charges for the operator service on a person to person call when the called party is not available or on a collect call when the charge is not accepted.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- There are none.

BILLABLE MESSAGE NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE LOCAL OR MESSAGE UNIT CHARGE

01

Category

Field Description					Char.				
Pos.									
1	Category		Record Identification		X				
2									
3	Group								
4									
5	Record Type		Date Of Record		9				
6									
7	Year								
8									
9	Month		Day						
10									
11									
12									
13	From Number Length				9				
14									
15	NPA	From Number		From Base Station Number		9			
16									
17									
18									
19	NXX								
20									
21									
22	Line Number								
23									
24									
25	Number Of Message Units				9				
26									
27									
28	To Number Length				9				
29									
30	NPA	To Number		To Base Station Number		9			
31									
32									
33									
34	NXX								
35									
36									
37	Line Number								
38									
39									
40	\$	Charge Or Amount Collected				9			
41									
42									
43									
44	¢								
45	¢								
46	Mill								
47	Type OF Regulation Indicator				9				
48	\$	State Tax	\$	Other Line/ Surcharge	\$	Total Module Tax and Surcharge	9		
49	¢								
50	¢	Local Tax	¢	WATS Class	¢				
51	\$								
52	¢	Orig WATS Band							
53	Hr	Connect Time				9			
54	Min								
55	Sec								
56	Min								
57	Min	Billable Or Reported Time				9			
58	Sec								
59	1/10								
60									

Field Characteristic
9 = Numeric
X = Alphanumeric

01

Group

Field Description				Char			
Pos.							
68	Method Of Recording			9			
69							
70	Return Code			X			
71							
72	From RAO			9			
73							
74							
76	Message Billing Index			9			
76							
77	Local Zone			9			
78	Rate Period			9			
79	Rate Class			9			
80	Message Type			9			
81	IOC Code		Term. WATS Band	9			
82	1	Indicators		9			
83	2						
84	3						
85	4						
86	5						
87	6						
88	7						
89	8						
90	9						
91	10						
92	11						
93	12						
94	13						
96	14						
96	15						
97	16						
88	17						
99	18						
100	19						
101	20						
102	Operator Unit		Serial Number	Obligation ID	9		
103							
104							
105	Recording Point						
106	Identification (AMA)						
107							
108							
109							
110	Billing RAO				9		
111							
112							
113	Billing Number North American Standard		Billing Number Non Standard		X		
114							
115							
116							
117							
118							
119							
120							
121							
122							
123	\$	Coin Tariff Amt	North Amer. From Place	Overseas From Place And Country	From Ship Name	CDAR No.	X
124	¢	Coin Fed Tax					
125	\$	SSAS Code					
126	¢	CnCrCd.					
127							
128							
129							
130			N.A. From State			Pseudo Trunk No. (SFO)	
131							
132							
133							
134							

31

Record Type

Pos.		Field Description		Char	
135		North American To Place	Overseas To Place And Country	To Ship Name	X
136					
137					
138					
139					
140					
141					
142					
143					
144					
145	No. American To State				
146					
147	Library Code				X
148					
149	Settlement Code				X
150					
151	Carrier Identification	Carrier Identification Expanded			9
152					
153					
154	Reserved				9
155					
156					
157	Treatable Indicator				9
158	21	Indicators			9
159	22				
160	23				
161	24				
162	25				
163	26				
164	27				
165	28				
166	29				
167	30				
168					
169	LSPID				X
170					
171					
172					
173	Reserved For Local Company Use				9
174					
175					
					</

RECORD DESCRIPTION

<u>01</u>	<u>01</u>	<u>32</u>
Category	Group	Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 32: DIRECTORY ASSISTANCE CHARGE

Use of Record:

This record is used to bill charges for messages terminating to a directory assistance * service (e.g. 411 or 555-1212).

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- To Number Length of 6 is acceptable on local DA.
- Terminating NXX should be 411 or 555.

BILLABLE MESSAGE NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE COLLECTION RECEIVED ON A PREVIOUS SHORTAGE

Record Name

01

Category

01

Group

15

Record Type

Field Description					Char.	
Pos.						
1	Category		Record Identification		X	
2						
3	Group					
4						
5	Record Type					
6						
7	Year		Date Of Record		9	
8						
9	Month					
10						
11	Day					
12						
13	From Number Length				9	
14						
15	NPA	From Number		From Base Station Number	9	
16						
17	NXX					
18						
19	Line Number					
20						
21						
22						
23						
24						
25	Overflow Digits				9	
26						
27	To Number Length				9	
28						
29	NPA	To Number		To Base Station Number	9	
30						
31	NXX					
32						
33	Line Number					
34						
35						
36						
37						
38						
39						
40	\$	Charge Or Amount Collected			9	
41						
42	¢					
43						
44	Mill					
45	Type OF Regulation Indicator				9	
46	\$	State Tax	\$	Other Line/ Surcharge	\$	Total Module Tax and Surcharge
47						
48	\$	Local Tax	¢	WATS Class	¢	
49						
50	Orig WATS Band					
51	Hr	Connect Time				9
52						
53	Min					
54						
55	Sec					
56						
57	Min	Billable Or Reported Time				9
58						
59	Sec					
60						
61	Min					
62						
63	Sec					
64						
65	Min					
66						
67	Sec					
68						

Field Characteristic
9 = Numeric
X = Alphanumeric

Field Description					Char
Pos.					
68	Method Of Recording				9
69	Reserved				9
70	Reserved				9
71	Reserved				9
72	From RAO				9
73	From RAO				9
74	From RAO				9
75	Local Company Information		Cust. Bill Format		9
76	Local Company Information		Conference Log Number		9
77	Local Company Information		Conference Log Number		9
78	Rate Period				9
79	Rate Class				9
80	Message Type				9
81	IOC Code		Term. WATS Band		9
82	1	Indicators			9
83	2				
84	3				
85	4				
86	5				
87	6				
88	7				
89	8				
90	9				
91	10				
92	11				
93	12				
94	13				
95	14				
96	15				
97	16				
98	17				
99	18				
100	19				
101	20				
102	Operator Unit		Serial Number	Obligation ID	9
103	Operator Unit				
104	Recording Point Identification (AMA)				
105	Recording Point Identification (AMA)				
106	Recording Point Identification (AMA)				
107	Recording Point Identification (AMA)				
108	Recording Point Identification (AMA)				
109	Recording Point Identification (AMA)				
110	Billing RAO				9
111	Billing RAO				9
112	Billing RAO				9
113	Billing Number North American Standard		Billing Number Non Standard		X
114	Billing Number North American Standard		Billing Number Non Standard		X
115	Billing Number North American Standard		Billing Number Non Standard		X
116	Billing Number North American Standard		Billing Number Non Standard		X
117	Billing Number North American Standard		Billing Number Non Standard		X
118	Billing Number North American Standard		Billing Number Non Standard		X
119	Billing Number North American Standard		Billing Number Non Standard		X
120	Billing Number North American Standard		Billing Number Non Standard		X
121	Billing Number North American Standard		Billing Number Non Standard		X
122	Billing Number North American Standard		Billing Number Non Standard		X
123	\$	Coin Tariff Amt	North Amer. From Place	Overseas From Place And Country	CDAR No.
124	\$	Coin Tariff Amt			
125	\$	Coin Tariff Amt			
126	\$	Coin Tariff Amt			
127	\$	Coin Fed Tax	From Ship Name	Pseudo Trunk No (SPG)	X
128	\$	Coin Fed Tax			
129	\$	Coin Fed Tax			
130	\$	Coin Fed Tax			
131	\$	Coin Fed Tax	N.A. From	Pseudo Trunk No (SPG)	X
132	SSAS Code				
133	SSAS Code				
134	SSAS Code				

Field Description				Char
Pos.				
135	North American To Place	Overseas To Place And Country	To Ship Name	X
136				
137				
138				
139				
140				
141				
142				
143				
144				
145	No. American			
146	To State			
147	Library Code			X
148				
149	Settlement Code			X
150	Carrier Identification	Carrier Identification Expanded		9
151				
152				
153				
154	Reserved			9
155				
156	Treatable Indicator			9
157				
158 21	Indicators			9
159 22				
160 23				
161 24				
162 25				
163 26				
164 27				
165 28				
166 29				
167 30				
168	LSPID			X
169				
170				
171				
172	Reserved For Local Company Use			9
173				
174				
175				

RECORD DESCRIPTION

01
Category

01
Group

16
Record Type

Category **01**: BILLABLE MESSAGE

Group **01**: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type **16**: INFORMATION PROVIDER SERVICE CHARGE

Use of Record:

This record is used to bill a service charge for a call terminating to an Information Provider. *

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- Traditionally, NPA 700 and 900 or NXX 976 have been reserved for IP Service; however, IP services are not limited to these terminating numbers.
- Record is for use with non-DA 555 (NXX) type of service. *

BILLABLE MESSAGE NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE INFORMATION PROVIDER SERVICE CHARGE

01

Category

Field Description					Char.
Pos.					
1	Category		Record Identification		X
2					
3					
4	Group				
5	Record Type				
6					
7	Year		Date Of Record		9
8					
9	Month				
10					
11	Day				
12					
13	From Number Length				9
14					
15	NPA	From Number		From Base Station Number	9
16					
17					
18	NXX				
19					
20					
21	Line Number				
22					
23					
24					
25	Overflow Digits				9
26					
27					
28	To Number Length				9
29					
30	NPA	To Number		To Base Station Number	9
31					
32					
33	NXX				
34					
35					
36	Line Number				
37					
38					
39					
40	\$	Charge Or Amount Collected			9
41					
42					
43					
44	¢				
45					
46	Mill				
47	Type OF Regulation Indicator				9
48	\$	State Tax	Other Line/ Surcharge	\$	Total Module Tax and Surcharge
49	¢				
50			WATS Class		
51					
52	\$	Local Tax	Orig WATS Band		
53	¢				
54					
55	Hr	Connect Time			9
56					
57	Min				
58					
59	Sec				
60					
61	Min	Billable Or Reported Time			9
62					
63					
64					
65					
66	Sec				
67	1/10				

Field Characteristic
9 = Numeric
X = Alphanumeric

01

Group

Field Description				Char		
Pos.						
68	Method Of Recording			9		
69						
70	Return Code			X		
71						
72	From RAO			9		
73						
74						
75	Local Company Information	Cust. Bill-Format		9		
76		Conference Leg Number		9		
77						
78	Rate Period			9		
79	Rate Class			9		
80	Message Type			9		
81	IOC Code	Term WATS Band		9		
82	1	Indicators		9		
83	2					
84	3					
85	4					
86	5					
87	6					
88	7					
89	8					
90	9					
91	10					
92	11					
93	12					
94	13					
95	14					
96	15					
97	16					
98	17					
99	18					
100	19					
101	20					
102	Operator Unit		Serial Number	Obligation ID	9	
103						
104						
105	Recording Point Identification (AMA)					
106						
107						
108						
109						
110	Billing RAO				9	
111						
112						
113	Billing Number North American Standard		Billing Number Non Standard		X	
114						
115						
116						
117						
118						
119						
120						
121						
122						
123	\$	Com Tariff Amt	North Amer. From Place	Over- seas From Place And Country	CDAR No.	X
124						
125	¢					
126	\$	Com. Fed. Tax				
127	¢					
128						
129						
130						
131						
132	SSAS Code		N.A. From State		Pseudo Trunk No. (SPG)	
133						
134	CrCrCd					

16

Record Type

Pos.		Field Description		Char
135	IP Service Name	Overseas To Place And Country	To Ship Name	X
136				
137				
138				
139				
140				
141				
142				
143				
144				
145				
146				
Library Code				X
148	Settlement Code			X
149	Carrier Identification	Carrier Identification Expanded	9	
150				
151	Reserved			9
152				
153	Treastable Indicator			9
154	Indicators	9		
155				
156				
157				
158				
159				
160				
161				
162				
163				
164				
165				
166				
167				
168	LSPID			X
169	Reserved For Local Company Use			9
170				
171				
172				
173				
174				
175				

RECORD DESCRIPTION

<u>01</u>	<u>01</u>	<u>17</u>
Category	Group	Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 17: VOICE MESSAGE SERVICE

Use of Record:

This record is used to bill a charge associated with a voice message service. This *
service allows a message to be recorded, stored and forwarded to a customer *
designated number.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- There are none.

BILLABLE MESSAGE NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE VOICE MESSAGE SERVICE

01

Category

Field Description						Char.
Pos.						
1	Category		Record Identification		X	
2						
3	Group					
4	Record Type		Date Of Record		9	
5	Year					
6	Month					
7	Day					
8	From Number Length					9
9	NPA	From Number	From Base Station Number		9	
10	NXX					
11	Line Number					
12						
13	Overflow Digits					9
14	To Number Length					9
15	NPA	To Number	To Base Station Number		9	
16	NXX					
17	Line Number					
18						
19	\$	Charge Or Amount Collected				9
20	¢					
21	Mill					
22						
23	Type OF Regulation Indicator					9
24	\$	State Tax	\$	Other Line/ Surchage	\$	Total Module Tax and Surchage
25	¢					
26	\$	Local Tax	WATS Class		¢	
27	¢		Orig WATS Band			
28	Hr	Connect Time				9
29	Min					
30	Sec					
31						
32	Min	Billable Or Reported Time				9
33						
34	Sec					
35						
36	1/10					

01

Group

Field Description					Char
Pos.					
68	Method Of Recording				
69					
70	Return Code				X
71					
72	From RAO				9
73					
74					
75	Reserved				9
76					
77	Service Name / Service Text Code Ind.				9
78	Rate Period				9
79	Rate Class				9
80	Message Type				9
81	IOC Code		Term. WATS Band		9
82	1	Indicators			9
83	2				
84	3				
85	4				
86	5				
87	6				
88	7				
89	8				
90	9				
91	10				
92	11				
93	12				
94	13				
95	14				
96	15				
97	16				
98	17				
99	18				
100	19				
101	20				
102	Operator Unit	Serial Number	Obligation ID	9	
103					
104	Recording Point Identification (AMA)				
105					
106					
107					
108					
109					
110	Billing RAO				9
111					
112					
113	Billing Number				X
114					
115					
116					
117					
118					
119					
120					
121					
122					
123	Service Name		Service Text Code		X
124					
125					
126					
127					
128					
129					
130					
131					
132					
133					
134					

17

Record Type

Field Description					Char
Pos.					
135	North American To Place	Overseas To Place And Country	To Ship Name		X
136					
137					
138					
139					
140					
141					
142					
143					
144					
145	No. American To State				
146					
147	Library Code				X
148					
149	Settlement Code				X
150	Carrier Identification	Carrier Identification Expanded			9
151					
152					
153					
154	Reserved				9
155					
156					
157	Treatable Indicator				9
158	21	Indicators			9
159	22				
160	23				
161	24				
162	25				
163	26				
164	27				
165	28				
166	29				
167	30				
168					
169	LSPID				X
170					
171					
172					
173	Reserved For Local Company Use				9
174					
175					

Field Characteristic
9 = Numeric
X = Alphanumeric

RECORD DESCRIPTION

01
Category

01
Group

18
Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 18: SPECIALIZED SERVICE/SERVICE PROVIDER CHARGE

Use of Record:

This record is used to bill the charge associated with a miscellaneous service for * which no other record has been defined.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- If message is associated with a flat rated surcharge (i.e., Indicator 24 = 3 Directory Assistance Call Completion (DACC)), the Billable Or Reported Time may be zero. |
- This record may be used for toll free 800 (888 etc.) detail billing. |
- This record cannot be used to bill 800 (888 etc.) pay per call/presubscribed 800 (888 etc.) service. |
- To Number field may contain a toll free number. |

**BILLABLE MESSAGE
NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE
SPECIALIZED SERVICE / SERVICE PROVIDER CHARGE**

Record Name

01

Category

01

Group

18

Record Type

Pos.	Field Description			Char.
1	Category			
2	Group			
3	Record Type			
4	Year			
5	Month			
6	Day			
7	From Number Length			9
8	NPA			
9	NXX			
10	Line Number			
11	From Number			
12	From Base Station Number			
13	Overflow Digits			9
14	To Number Length			9
15	NPA			
16	NXX			
17	Line Number			
18	To Number			
19	To Base Station Number			
20	Charge Or Amount Collected			9
21	Type OF Regulation Indicator			9
22	State Tax			
23	Local Tax			
24	Other Line/ Surcharge			
25	WATS Class			
26	Orig WATS Band			
27	Hr			
28	Min			
29	Sec			
30	Connect Time			9
31	Min			
32	Sec			
33	Billable Or Reported Time			9
34	1/10			

Pos.	Field Description			Char.
35	Method Of Recording			9
36	Return Code			X
37	From RAO			9
38	Reserved			9
39	Service Name / Service Text Code Ind.			9
40	Rate Period			9
41	Rate Class			9
42	Message Type			9
43	IOC Code			9
44	Term WATS Band			9
45	Indicators			9
46	Operator Unit			
47	Recording Point Identification (AMA)			
48	Serial Number			
49	Obligation ID			9
50	Billing RAO			9
51	Billing Number North American Standard			
52	Billing Number Non Standard			X
53	Coin Tariff Amt			
54	North Amer. From Place			
55	Overseas From Place And Country			
56	From Ship Name			
57	CDAR No.			X
58	SSAS Code			
59	N.A. From State			
60	CnCrCd.			
61	Pseudo Trunk No. (SFO)			

Pos.	Field Description			Char.
62	Service Name			
63	Service Text Code			X
64	Library Code			X
65	Settlement Code			X
66	Carrier Identification			
67	Carrier Identification Expanded			9
68	Reserved			9
69	Treatable Indicator			9
70	Indicators			9
71	LSPID			X
72	Reserved For Local Company Use			9

Field Characteristic

9 = Numeric
X = Alphanumeric

RECORD DESCRIPTION

<u>01</u>	<u>01</u>	<u>25</u>
Category	Group	Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 25: 800 SERVICE (RECORDED AT SSP)

Use of Record:

This record is used to bill the charge for 800 Data Base Service (DBS).

*

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y
20-23-09/10	N	Y

Special Considerations:

- The "Destination Number" ("Destination Number/Billing Number" or "Destination Number 2"), contains the translated POTS number (translated from the dialed 800 number) when that number is available; otherwise, the "Destination Number" field repeats the dialed 800 number. *
- The "North American From Place" and "State" is an optional field. *
- Use of the "Destination Number/Billing Number" and "Destination Number 2" fields is negotiated between the sending and receiving companies. *

BILLABLE MESSAGE **NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE** **800 SERVICE (RECORDED AT THE SSP)**

Record Name

01

Category

Field Description					Char.		
Pos.							
1	Category		Record Identification		X		
2							
3	Group						
4							
5	Record Type		Date Of Record		9		
6							
7	Year						
8	Month						
9							
10	Day						
11							
12							
13	From Number Length				9		
14							
15	NPA	From Number		From Base Station Number		9	
16							
17	NXX						
18							
19	Line Number						
20							
21							
22	Overflow Digits				9		
23							
24	Dialed Number Length				9		
25							
26	800	Dialed Number (800 #)		To Base Station Number		9	
27							
28	NXX						
29							
30	Line Number						
31							
32							
33	\$	Charge Or Amount Collected				9	
34							
35	¢						
36							
37	Min						
38	Type OF Regulation Indicator					9	
39	\$	State Tax	\$	Other Line/ Surcharge	\$	Total Module Tax and Surcharge	9
40							
41	¢	Local Tax	¢	WATS Class	¢		
42							
43	Orig-WATS Band						
44	Hr	Connect Time					9
45							
46	Min						
47							
48	Sec	Billable Or Reported Time					9
49							
50	Min						
51							
52	Sec						
53							
54	1/10						
55							

Field Characteristic
9 = Numeric
X = Alphanumeric

01

Group

Field Description				Char		
Pos.						
68	Method Of Recording			9		
69						
70	Return Code			X		
71						
72	From RAO			9		
73						
74						
75	Local Company Information	Cust. Bill Format		9		
76		Conference Leg Number		9		
77						
78	Rate Period			9		
79	Rate Class			9		
80	Message Type			9		
81	IOC Code		Term, WATS Band	9		
82	1	Indicators		9		
83	2					
84	3					
85	4					
86	5					
87	6					
88	7					
89	8					
90	9					
91	10					
92	11					
93	12					
94	13					
95	14					
96	15					
97	16					
98	17					
99	18					
100	19					
101	20					
102	Operator Unit		Serial Number	Obligation ID	9	
103						
104						
105						
106	Recording Point Identification (AMA)					
107						
108						
109						
110	Billing RAO				9	
111						
112						
113	NPA		Destination Number		X	
114						
115						
116						
117	NXX					
118						
119						
120	Line Number					
121						
122						
123	\$	Coin Tariff Amt	North Amer. From Place	Over- seas From Place And Country	CDAR No.	X
124						
125						
126	\$					
127	\$	Coin Fed Tax				
128						
129	\$					
130						
131	\$					
132	SSAS Code		N.A. From From		Pseudo Trunk No. (SFG)	
133						
134	CnCrCd					

25

Record Type

Pos.	Field Description			Char.
135	North American To Place	Overseas To Place And Country	To Ship Name	X
136				
137				
138				
139				
140				
141				
142				
143	No. American To State			
144				
145	Library Code			X
146	Settlement Code			X
147	Carrier Identification		Carrier Identification Expanded	9
148				
149	Reserved			9
150	Treatable Indicator			9
151	21	Indicators		9
152	22			
153	23			
154	24			
155	25			
156	26			
157	27			
158	28			
159	29			
160	30			
161	LSPID			X
162				
163	Reserved For Local Company Use			9
164				
165				
166				
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174				
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300				

RECORD DESCRIPTION

01

Category

01

Group

31

Record Type

Category 01: BILLABLE MESSAGE

Group 01: NORTH AMERICAN ORIGINATED, TERMINATED AND BILLABLE

Rec. Type 31: LOCAL OR MESSAGE UNIT CHARGE

Use of Record:

This record is used to bill a charge associated with a local message as identified in a *
local tariff.

<u>Headers/Trailers:</u>	<u>CMDS</u>	<u>Local</u>
20-20-01/02	Y	Y
20-21-01/02	N	Y
20-22-01/02	Y	Y
20-22-03/04	Y	Y

Special Considerations:

- Carrier Identification Code (CIC) will be non-zero when the call is billed to an interexchange carrier (IC) billing card (e.g., CIID or 891), the message was purchased by the IC and forwarded to an EC for billing using a 20-22-03/04 header/trailer. Otherwise, the CIC will always be zeros.

**LIABILITY FOR UNAUTHORIZED CHARGES
CASE SUMMARIES**

Liability for Unauthorized Charges Case Summaries:

AT&T v. City of New York, 83 F.3d 549 (2nd Cir. 1996):

- "FCC has determined that a party can "order" toll (long-distance) service, and thus become a "customer" -- i.e., liable under the tariff -- in two ways: (1) by affirmatively ordering service by presubscribing, or (2) by "constructively" ordering and creating an inadvertent carrier-customer relationship" by failing to take reasonable steps to control unauthorized charging of AT&T long-distance calls to the party's telephone number." (emphasis added).
- For purposes of "constructive ordering," it is enough that the calls were placed from the customer's phone, regardless of who placed them and/or under what conditions.
- Customer has a duty to take reasonable steps to prevent unauthorized calls, and this determination can be material with regard to liability.

American Message Ctrs. v. FCC, 50 F.3d 35 (D.C. Cir. 1995)

- FCC appropriately determined that Sprint's tariffs clearly and explicitly require its customers to pay for all completed calls.
- Pursuant to Sprint's tariff, "if Sprint provides service -- in other words, if the call goes through -- the customer has to pay for the call." Liability for toll fraud or unauthorized calls need not be specifically set forth.

AT&T v. Intrend Ropes, 944 F.Supp. 701 (C.D. Ill. 1996):

- To avoid liability pursuant as set forth in AT&T's tariff, customer must demonstrate that they "lacked the ability to control" the mechanism by which the calls were being made.

AT&T v. Community Health Group, 931 F.Supp. 719 (S.D. Cal. 1995):

- "Constructive ordering" sufficient to establish customer liability.
- Customer has duty to, if possible, control unauthorized charging of services to its phone, and failure to do so presents significant obstacle to avoiding liability (*particularly mentions CHG's failure to implement line-blocking features*).
- "[C]ustomer is liable for all long distance calls made from its on-premises [equipment (in this case a PBX)], regardless of whether such calls were unauthorized or fraudulent." (*italics in original, underlining added*).

MCI v. Ameri-Tel, Inc., 852 F.Supp. 659 (N.D. Ill. 1994)

- "Though it has been careful to limit the decisions to the record made in specific cases, the FCC has not held that it is an unreasonable practice to seek recovery of unauthorized charges from a customer. In fact, its current decisions appear to indicate the opposite is true[.]"
- Recognizes that the FCC has already indicated its view that a carrier's attempt to collect unauthorized charges in a PBX

- fraud case is not unreasonable if consistent with the terms of its tariff.
- The Court ultimately concludes that there was no need for it "to delve deep into the world of information indicators, automatic number identifiers, operator line screening, billed number screening," etc., in deciding that it would rule that subscribers are liable for "unauthorized" calls.
- Recognized that customer had subscribed to blocking services through LEC but, because MCI was not provider of that service, it was not a bar to MCI's recovery for "unauthorized" charges pursuant to its tariff.

AT&T v. N.Y. City Human Resources Admin., 833 F.Supp. 962 (S.D.N.Y. 1993):

- Tariffs are not mere contracts, but rather have the force of law, and they conclusively and exclusively enumerate the rights and liabilities of the contracting parties
- Pursuant to tariff, customers are liable for charges for (off-premise) unauthorized calls (*citing and explaining AT&T v. ITT Consumer Fin. Corp.*, 3-89 Civ 374 (D. Minn. 1990)).
- All four cases cited by this case, including the Minnesota case, "reaffirm well settled law that, under [AT&T's] Tariff, a customer is responsible for all calls placed from his or her telephone, whether authorized or not." (emphasis added).
- AT&T not deemed to have engaged in willful misconduct sufficient to vitiate liability under tariff because it did not have knowledge of unauthorized nature of calls.
- AT&T had no general duty to warn of potential of toll fraud.

AT&T v. Jiffy Lube Int'l, Inc., 813 F.Supp. 1164 (D. Md. 1993):

- "[C]ase law going back to *Southwestern Tel. & Tel. Co. v. Sharp & White*, 118 Ark. 541, 117 S.W. 25 (1915), holds that a telephone call will be charged to the number from which it originated, whether authorized or not." (emphasis added).
- AT&T's Tariff squarely places responsibility upon a customer for calls, whether or not "authorized" which "originated" at the customer's number (*citing four cases, including AT&T v. ITT*).
- Analogizes "unauthorized" nature of off-premises unauthorized call to concept of someone stealing a key to customer's premises and using the phone therein.
- As to arguments regarding novel questions of liability or customer and/or carrier liability under tariffs other than AT&T Tariff or for services not offered pursuant to tariff, "such arguments are better left put to the FCC."

Industrial Leasing Corp. v. GTE Northwest, Inc., 818 F.Supp. 1372 (D. Oregon 1992):

- While it was clear that ILC never "specifically requested" the calls be made, the tariff allows for billing for calls originating at its numbers and therefore unambiguously

applies to the charges incurred through unauthorized access to ILC's system.

Directel, Inc. v. AT&T, 12 FCC Rcd 7554 (CCB 1996):

- Reaffirms that party is a customer, and therefore liable for "unauthorized" calls pursuant to AT&T's tariff, if calls are placed from the customer's equipment.

Gen. Plumbing Corp. v. NY Tel. Co., 11 FCC Rcd 11799 (CCB 1996):

- Reaffirms that question of liability under tariff hinges on control and ability to, and actuality of, implementing preventative measures.

Chartways Tech., Inc. v. AT&T, 6 FCC Rcd 2952 (CCB 1991), *affd.* 8 FCC Rcd 5601 (1993):

- Seminal FCC case holding that AT&T's tariff encompasses unauthorized calls from a customer's phone, particularly where customer had capability to restrict the calls being made therefrom.

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